

ROTTENBERG LIPMAN RICH, P.C.

NEW JERSEY OFFICE
PARK 80 WEST, PLAZA ONE
250 PEHLE AVENUE, SUITE 101
SADDLE BROOK, NEW JERSEY 07663
TELEPHONE (201) 490-2022
TELECOPIER (201) 490-2040

230 PARK AVENUE
EIGHTEENTH FLOOR
NEW YORK, NEW YORK 10169
TELEPHONE (212) 661-3080
TELECOPIER (212) 867-1914

WWW.RLRPCLAW.COM
BERTRAND C. SELLIER
MEMBER
BSELLIER@RLRPCLAW.COM

August 8, 2025

VIA ECF and E-MAIL:

The Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007

Re: Goldfarb v. Channel One Russia
Index No. 18-CV-08128 (JPC)

Dear Judge Cronan:

Together with Rodney Smolla, Esq., we represent Plaintiff and Judgement Creditor Alex Goldfarb. On July 17, 2025, a telephone conference was held with counsel for Charter Communications, DirecTV, LLC and NBC Universal (collectively, the “Garnishees”) concerning Dr. Goldfarb’s pending turnover motion. Your Honor directed the parties to confer and submit a joint letter concerning the issues raised during the July 17 conference by July 24, which date was extended to August 8. Counsel for Plaintiff and the Garnishees met and conferred following the July 17 conference, and this letter represents a joint response.

We respectfully request to amend Dr. Goldfarb’s turnover motion to be made pursuant to both Sections 5225(b) and 5227 of the New York Civil Practice Law and Rules, and to name International Media Distribution, LLC (“IMD”), a subsidiary of NBC Universal (“NBCU”), and Charter Communications Operating, LLC (“CCO LLC”), a subsidiary of Charter Communications (“Charter”), as additional Garnishees. Ms. Olivia Radin, counsel for NBCU, has confirmed that she is authorized to accept service of an amended motion on behalf of IMD. Ms. Lamina Bowen, counsel for Charter, has confirmed that she is authorized to accept service of an amended motion on behalf of CCO LLC. We also request permission to serve all of the motion papers and any order issued by the Court concerning this application on Channel One Russia by serving an authorized agent in the Office of the Secretary of State of the State of New York.

Counsel for NBCU and IMD advises that the payables previously identified are owed to Joint Stock Company Channel One Russia Worldwide (“CORW”), and that in order to release the money IMD and its bank will require an order from the Court directing IMD to pay those funds to Dr. Goldfarb and an OFAC license authorizing the transaction.

ROTTENBERG LIPMAN RICH, P.C.

August 8, 2025
Page 2

Counsel for DirecTV advises that the payables previously identified are owed to CORW, and that in order to release the money DirecTV and its bank will require an order from the Court directing DirecTV and its bank to pay those funds to Dr. Goldfarb and an OFAC license authorizing the transaction.

Counsel for Charter and CCO LLC advises that the payables previously identified are owed to CORW, and that in order to release the money, CCO LLC and its bank will require an order from the Court directing CCO LLC and its bank to pay those funds to Dr. Goldfarb and an OFAC license authorizing the transaction.

Thank you for your attention to this matter.

Respectfully,



Bertrand C. Sellier

cc: All counsel of Record (via ECF)